



December 2, 2002

FILED ELECTRONICALLY

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: EX PARTE: WC Docket No. 02-314 – Application of Qwest
Communications International, Inc. for Authorization to Provide In-
Region, InterLATA Service in the States of Colorado, Idaho, Iowa,
Montana, Nebraska, North Dakota, Utah, Washington, and Wyoming**

Dear Ms. Dortch:

Recently there has been a pattern of significant EDI problems announced by Qwest to CLECs. For example, as shown in the attached “Event Notifications,” Qwest has returned on customer service records invalid values that fail in CLECs' EDI translators; has returned error messages incorrectly telling CLECs that they have requested work on a disconnected account when the account actually is live; and has returned error messages telling CLECs they cannot submit supplemental orders to change due dates. These are serious problems that would not exist in quality systems. And Qwest has not even coded them as severity 1 problems. Moreover, Qwest has not provided CLECs an explanation of the root cause of the problems or provided dates on which the problems will be fixed. Instead, Qwest has proposed work-arounds for the problems. But most of the work-arounds require CLECs to adopt a manual mode or alter their systems. Such work-arounds are unacceptable for CLECs such as WorldCom that have automated systems.

WorldCom has attached a sampling of the “Event Notifications” Qwest has provided concerning these problems. They underscore WorldCom's longstanding contention that Qwest's OSS is far inferior to other BOCs and significantly impedes a CLEC's ability to compete.

Please call me with any questions about this matter.

Sincerely,

Lori Wright
Associate Counsel
Federal Advocacy

cc: J. Myles; G. Remondino; M. Carowitz; R. Harsch; J. Jewell; P. Baker; C. Post; P. Fahh; B. Smith; S. Vick; J. Orchard; S. Oxley; WA UTC; G. Cohen; M. Greene

Enclosures